TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Okeelanta Corporation
21250 U.S. Highway 27 South
South Bay, Florida 33493

Okeelanta Sugar Mill
Facility ID No. 0990005

PROJECT

Project No. 0990005-037-AC
Application for Minor Source Air Construction Permit
Add Sugar Pkg. Lines No. 16, 17, 18, & 19 and Revise line No. 5

COUNTY

Palm Beach, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Engineering and Permitting Section
South District Office
2295 Victoria Avenue
Fort Myers, FL 33901

November 14, 2013

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

Facility Description and Location

Okeelanta Corporation is an existing facility that is categorized under Standard Industrial Classification Code No. 2061 and 2062. The facility is located in Palm Beach County at 21250 U.S. Highway 27, South in South Bay, Florida. The UTM coordinates of the existing facility are Zone 17, 524.9 km East, and 2940.1 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

Facility Regulatory Categories

- Title III: The facility is identified as a potential major source of hazardous air pollutants (HAP).
- Title IV: The facility has no units subject to the acid rain provisions of the Clean Air Act.
- Title V: The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- PSD: The facility is a PSD-major source of air pollution in accordance with Rule 62-212.400, F.A.C.
- NSPS: The facility has units subject to the New Source Performance Standards in 40 CFR 60.
- NESHAP: The facility has units subject to the National Emissions Standards for Hazardous Air Pollutants in 40 CFR 61 or 63.

This project is subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The Florida Statutes authorize the Department of Environmental Protection to establish rules and regulations regarding air quality as part of the Florida Administrative Code (F.A.C.). Air pollution sources are subject to the applicable provisions in Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-214, 62-296, and 62-297, F.A.C. The emissions units described in this project are subject to the following specific regulations:

- Opacity Standard: As determined by EPA Method 9 observations, visible emissions from each baghouse exhaust point shall not exceed 5% opacity. [Rule 62-4.070(3), F.A.C.];

Project Description

Add four (4) additional sugar packaging lines to be located in Warehouse No. 3. The additional packaging lines are a separate operation from the existing specialty sugar production in Warehouse No. 3. Two (2) rooms will be built in the interior of the warehouse. Two (2) packaging lines (Packaging Lines No. 16 and 17) to package artificial sweeteners will be installed in one room and two (2) packaging lines (Packaging Lines Nos. 18 and 19) for specialty sugars will be housed in the second room. The potential emissions from the packaging lines consists of particulate matter (PM) in the form of sugar dust, and all four (4) packaging lines are controlled by one (1) Dust collector (baghouse) (EU-059).

Note: One of these packaging lines will actually be the existing Packaging Line No. 5 presently located in the Transshipment Facility, which will be re-located to Warehouse No. 3. This existing packaging line will be replaced in the Transhipment Facility by a brown sugar packaging line of approximately the same capacity. It will continue the designation as Packaging Line No. 5.

The maximum production rate due to the four (4) additional packaging lines at Warehouse No. 3 will be 181.2 TPD. The four (4) packaging lines are permitted to operate up to 8,760 hours per year (hr/yr).

The four (4) packaging lines will have a dust control system installed and vented to a "single dust collector" (EU-059), which will vent through the roof of the building. The emissions from the dust collector (baghouse) are calculated at 0.29 pounds per hour (lb/hr) and 1.28 tons per year (TPY).

Processing Schedule

November 7, 2013, Received the application for a minor source air pollution construction permit.

2. PSD APPLICABILITY

General PSD Applicability

For areas currently in attainment with the state and federal AAQS or areas otherwise designated as unclassifiable, the Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C. Under preconstruction review, the Department first must determine if a project is subject to the PSD requirements ("PSD applicability review") and, if so, must conduct a PSD preconstruction review. A PSD applicability review is required for projects at new and existing major stationary sources. In addition, proposed projects at existing minor sources are subject to a PSD applicability review to determine whether potential emissions *from the proposed project itself* will exceed the PSD major stationary source thresholds. A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit:

- 250 tons per year or more of any regulated air pollutant; or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the following 28 PSD-major facility categories: fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants and charcoal production plants.

Once it is determined that a project is subject to PSD preconstruction review, the project emissions are compared to the "significant emission rates" defined in Rule 62-210.200, F.A.C. for the following pollutants: carbon monoxide

(CO); nitrogen oxides (NO_X); sulfur dioxide (SO_2); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM_{10}); volatile organic compounds (VOC); lead (Pb); fluorides (Fl); sulfuric acid mist (SAM); hydrogen sulfide (H_2S); total reduced sulfur (TRS), including H_2S; reduced sulfur compounds, including H_2S; municipal waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as particulate matter; municipal waste combustor acid gases measured as SO_2 and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as non-methane organic compounds (NMOC); and mercury (Hg). In addition, significant emissions rate also means any emissions rate or any net emissions increase associated with a major stationary source or major modification which would construct within 10 kilometers of a Class I area and have an impact on such area equal to or greater than 1 $\mu g/m^3$, 24-hour average.

If the potential emission exceeds the defined significant emissions rate of a PSD pollutant, the project is considered "significant" for the pollutant and the applicant must employ the Best Available Control Technology (BACT) to minimize the emissions and evaluate the air quality impacts. Although a facility or project may be *major* with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several "significant" regulated pollutants.

PSD Applicability for Project

EU No.	Description	PM Tons/Year	PM10 Tons/Year
056	Baghouse (Pkg. Lines No. 16, 17, 18 and 19)	1.28	0.051

As provided in the application, the following table summarizes potential emissions and PSD applicability for the project.

Table A. Potential Emissions (Tons/Year) and PSD Applicability

Pollutant	Project Potential Emissions (TPY)	Significant Emissions Rate (TPY)	Subject To PSD?
CO	N/A	100	No
NO_X	N/A	40	No
PM/PM_{10}	1.28	25/15	No
SO_2	N/A	40	No
VOC	N/A	40	No

As shown in the above table, total project emissions will not exceed the PSD significant emissions rates; therefore, the project is not subject to PSD preconstruction review.

3. APPLICATION REVIEW

Discussion of Emissions

Emissions are particulate matter only, (sugar dust).

Standard Industrial Classification Code (SIC)

SIC Nos. – 2061, 2062, and 4911

4. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Carter B. Endsley, P.E. is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Department's South District Office at 2295 Victoria Avenue, Suite 364, Fort Myers, Florida 33902.